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8 Attorney for Plaintiff
9 JAMES MURTAGH, MD

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 JAMES MURTAGH, M.D., *an individual*,) CASE NO.

13) 2:15-cv-05204-BRO-FFM

14 *Plaintiff,*

15)
16) NOTICE OF
17) MOTION TO COMPEL
18) DOCUMENT PRODUCTION

19 vs.

20 DAVID PARDO, *an individual*,

21) Discovery Cutoff: June 17, 2016
22) Pretrial Conference: August 15,
23) 2016
24) Trial Date: September 13, 2016

25 and

26 JOHN DOES, 1 to 10,

27) Hearing Date: May 31, 2016
28) Time: 10:00AM
29) Courtroom: No. 580
30) Judge: Frederick F. Mumm

31 *Defendants.*

32) Hon. Beverly Reid O'Connell

33 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

34 **PLEASE TAKE NOTICE** that on May 31, 2016 at 10:00 a.m., or as soon
35 thereafter as the matter may be heard in Courtroom 580 of the Roybal
36 Federal Building, 255 East Temple Street Courthouse, Los Angeles,
37 California 90012-3332, Plaintiff JAMES MURTAGH, MD will move the
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1 Court to compel the production of documents related to witness DAVID
2 STEELE related to communications between Mr. David Steele and Mr.
3 Clark Baker and Mr. David Pardo regarding plaintiff on the grounds that
4 such documents are relevant and necessary to proving allegations in
5 Plaintiff's Complaint.

6 The Motion will be based on this Notice of Motion, Motion to Compel,
7 attached exhibits, and Declarations of plaintiff Dr. James Murtagh, MD and
8 Steven Smith, counsel.

9 Respectfully Submitted

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11 Dr. James Murtagh, MD

12 By: /s/ Steven D. Smith
13 Steven D. Smith
14 *Counsel for Plaintiff James Murtagh, M.D.*

15 DATED: APRIL 27, 2016
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